

1 THE O'MARA LAW FIRM, P.C.
2 DAVID C. O'MARA, ESQ. (NEVADA BAR NO. 8599)
3 311 East Liberty St.
4 Reno, Nevada 89501
5 775-323-1321
6 775-323-4082 (fax)
7 david@omaralaw.net

8 *Attorney for Plaintiffs*

9 *(Additional counsel on signature page)*

10
11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 CHARLOTTE BOWNES; JOSEPH
14 LAGRECA; JESSICA NAUMANN; and
15 FERMIN OROPEZA PALACIOS,
16 individually and on behalf of all others
17 similarly situated,

18 Plaintiffs,

19 v.

20 IGT; MGM GRAND DETROIT LLC;
21 BLUE TARP REDEVELOPMENT, LLC;
22 UTGR, LLC; NP PALACE LLC; COAST
23 HOTELS AND CASINOS, INC.; THE
24 CANNERY HOTEL AND CASINO,
25 LLC,

26 Defendants.

Case No. 3:24-cv-00528-ART-CSD

**ORDER GRANTING STIPULATION TO
EXTEND DEADLINES REGARDING
DEFENDANTS' MOTION TO STAY
DISCOVERY AND CONFIRM DEADLINE
FOR PLAINTIFFS TO RESPOND TO
DEFENDANTS' MOTION TO DISMISS**

(FIRST REQUEST)

Pursuant to LR IA 6-1, Plaintiffs Charlotte Bownes, Joseph Lagreca, Jessica Naumann, and Fermin Oropeza Palacios, on one hand, and Defendants IGT; MGM Grand Detroit LLC; Blue Tarp reDevelopment, LLC; UTGR, LLC; NP Palace LLC; Coast Hotels and Casinos, Inc.; and The Cannery Hotel and Casino, LLC (collectively, the “Parties”), on the other hand, hereby stipulate and agree subject to the Court’s approval to extend the time for Plaintiffs to file a response and Defendants to file a reply to Defendants’ Joint Motion to Stay Discovery (“Motion to Stay”) (ECF No. 42). The current deadline for Plaintiffs to file a response to the Motion to Stay is May 1, 2025. The current deadline for Defendants to file a reply to the Motion to Stay is May 8. The Parties request that Plaintiffs’ deadline to file a response to the Motion to Stay be extended until May 27, 2025, and that Defendants’ deadline to file a reply be extended until June 20, 2025. This is the first request for an extension of the deadlines to file a response and a reply to the Motion to Stay.

The Parties also seek to confirm that Plaintiffs’ deadline to file a response to Defendants’ Joint Motion to Dismiss (“Motion to Dismiss”) is May 19, 2025, consistent with the Order previously entered by this Court. *See* ECF No. 29. The minute entry accompanying Defendants’ Motion to Dismiss states “Responses due by 5/1/2025,” *see* ECF No. 40, but the Parties previously stipulated and agreed, and this Court ordered, Plaintiffs to respond to the Motion to Dismiss by May 19, 2025. *See* ECF No. 29. The Parties therefore seek to confirm that the May 19, 2025, deadline for Plaintiffs to oppose the Motion to Dismiss remains in effect.

1. On November 21, 2024, Plaintiffs filed their Complaint. ECF No. 1.

2. On February 14, 2025, the Court entered an Order setting deadlines for an amended complaint and related briefing schedule. *See* ECF No. 29. That Order set the following deadlines: (1) March 17, 2025: deadline for Plaintiffs to file an amended complaint; (2) April 17, 2025: deadline for Defendants’ responsive motions; (3) May 19, 2025: deadline for Plaintiffs’ oppositions to Defendants’ responsive motions; and (4) June 2, 2025: deadline for Defendants’ replies to Plaintiffs’ oppositions. ECF No. 29.

3. On March 17, 2025, Plaintiffs filed their First Amended Complaint. ECF No. 30.

4. On April 17, 2025, Defendants filed their Motion to Dismiss. ECF No. 40.

1 5. The minute entry accompanying Defendants’ Motion to Dismiss states “Responses
2 due by 5/1/2025.” *See* ECF No. 40. This deadline conflicts with the May 19, 2025, deadline for
3 Plaintiffs to respond to Defendants’ Motion to Dismiss previously established by this Court. *See*
4 ECF No. 29. The Parties have stipulated and agreed to maintain the previously entered deadline
5 of May 19, 2025, for Plaintiffs to file a response to Defendants’ Motion to Dismiss.

6 6. On April 17, 2025, Defendants filed a Motion to Stay Discovery. *See* ECF No. 42.

7 7. By operation of Local Civil Rule 7-2(b), the current deadline for Plaintiffs to file a
8 response to the Motion to Stay is May 1, 2025.

9 8. Subject to the Court’s approval, the Parties have agreed to extend Plaintiffs’
10 deadline to file a response to the Motion to Stay until May 27, 2025, and Defendants’ deadline to
11 file a reply to the Motion to Stay until June 20, 2025.

12 9. Good cause exists to grant this stipulation as counsel for both Parties have
13 interceding deadlines in other cases and pre-planned travel, and this stipulation is submitted in
14 good faith, is not interposed for delay, and is not filed for an improper purpose.

15 DATED: April 24, 2025

DATED: April 24, 2025

16 /s/ David C. O’Mara, Esq.

/s/ Carrie S. Dettmer

DAVID C. O'MARA, ESQ.

311 E. Liberty St.
Reno, NV 89501
775.323.1321
david@omaralaw.net

THE MILLER LAW FIRM

E. POWELL MILLER (*pro hac vice*)
GREGORY A. MITCHELL (*pro hac vice*)
950 W. University Drive, Suite 300
Rochester, MI 48307
Telephone: (248) 841-2200
E-Mail: epm@millerlawpc.com

HEDIN LLP

FRANK S. HEDIN (*pro hac vice*)
TYLER K. SOMES (*pro hac vice*)
1395 Brickell Ave, Suite 610
Miami, Florida 33131
Telephone: (305) 357-2107
fhedin@hedinllp.com
tsomes@hedinllp.com

*Attorneys for Plaintiffs individually and
on behalf of all others similar situated*

PAUL G. KARLSGODT (*Pro hac vice*)

Email: pkarlsgodt@bakerlaw.com
BAKER & HOSTETLER LLP
1801 California St., Suite 4400
Denver, CO 80202
Telephone: (303) 861-0600

CARRIE DETTMER SLYE (*Pro hac vice*)

Email: cdettmerslye@bakerlaw.com
BAKER & HOSTETLER LLP
312 Walnut Street, Suite 3200
Cincinnati, OH 45202-4074
Telephone: (513) 852-2626

Attorneys for Defendant IGT

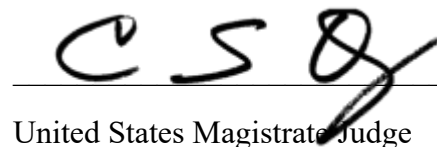
DAVID A. CARROLL (NSB #7643)

Email: dcarroll@rrsc-law.com
ANTHONY J. DIRAIMONDO (NSB #10875)
Email: adiraimondo@rrsc-law.com
ROBERT E. OPDYKE (NSB #12841)
Email: ropdyke@rrsc-law.com
RICE REUTHER SULLIVAN & CARROLL,
LLP

3800 Howard Hughes Parkway, Suite 1200
Las Vegas, Nevada 89169
Telephone: (702) 732-9099

*Attorneys for Defendants IGT; MGM Grand
Detroit, LLC; Blue Tarp reDevelopment, LLC;
UTGR, LLC; NP Palace LLC; Coast Hotels
and Casinos, Inc.; and The Cannery Hotel and
Casino, LLC*

IT IS SO ORDERED



United States Magistrate Judge

Date: April 24, 2025.